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WASHINGTON, DC

August 23, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: **Notice of Ex Parte Communication**  
**MB Docket No. 09-182**  
**MB Docket No. 14-50**

Dear Ms. Dortch:

On August 22, 2017, the undersigned and Ed Levine, CEO of Galaxy Communications LLC ("Galaxy"), met with Alison Nemeth, Media Advisor for Chairman Pai, to discuss the need for relaxation of the local radio ownership rule (47 C.F.R. §73.3555(a)).

Mr. Levine discussed the difficult competitive landscape faced by locally owned and operated radio companies such as Galaxy and the dramatic changes that have taken place in the local advertising market in recent years because of the increasing amount of local advertising dollars garnered by online and digital media such as Google and Facebook. In particular, Mr. Levine cited to the analysis of local advertising revenue in the Syracuse, New York market prepared by BIA/Kelsey that was submitted in a written ex parte communication submitted by Galaxy on March 10, 2017, and explained that this analysis clearly demonstrates that the share of advertising revenue garnered by online and digital media companies, which are not restricted by ownership limitations, is growing exponentially. Mr. Levine emphasized that because of these changes in the marketplace, the existing ownership restrictions are inhibiting the ability of local radio stations to serve the needs and interests of listeners and advertisers in their markets. He recommended that the rule be modified to increase the numerical limits in each market-size tier.

In the event that there are questions concerning this matter, please contact the undersigned.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Sally A. Buckman', with a long, sweeping horizontal line extending to the right.

Sally A. Buckman  
*Counsel to Galaxy Communications, LLC*

cc: Alison Nemeth